

# EXHIBIT H

**Harkins, Steven M. (Assoc-ATL-LT)**

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**From:** Harkins, Steven M. (Assoc-ATL-LT)  
**Sent:** Saturday, February 22, 2020 2:45 PM  
**To:** 'bvp@kirtlandpackard.com'  
**Cc:** Rubenstein, Brian (Shld-PHIL-LT); Lockard, Victoria D. (Shld-Atl-LT); Cohen, Lori (Shld-Atl-LT)  
**Subject:** Valsartan - Call to Discuss Teva's Search Terms

Behram,

We would like to see if you are available Monday or Tuesday of next week to discuss the Teva Defendants' search terms in advance of the CMC on Wednesday. We are available Monday before 10 a.m. EST and from 1-4 p.m. EST, and on Tuesday any time after 1 p.m. EST. As a primer, we have identified several areas where we would like to propose modifications:

1. (delet\* or destroy\* or remov\* or trash\* or shred\*) AND ((\*Valsartan\* OR amlodipine\* OR Diovan\* OR Exforg\* OR (HCT or HCTZ) OR (sartan or sartans)) OR ((\*azide\* OR \*formaldehyde\* OR \*-N3\* OR \*xylene\* OR acid\* OR aqueous\* OR chloramin\* OR HNO2 OR hydrochlor\* OR N-3\* OR NaNO\* OR toluene\* OR Tributyl\* OR TIN OR Triethyl\* OR TEA OR (zinc W/3 chloride) OR ZnCl\*) AND NOT(PIOGLITAZONE OR OLMESARTAN)) OR (("Abbreviated New Drug Application" or ANDA) OR (CDC or "Centers for Disease Control") OR (CDER or "Center for Drug Evaluation and Research") OR (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency") OR ("Environmental Protection Agency" or EPA or USEPA or "US-EPA" or "1200 Pennsylvania Avenue") OR ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park") OR (NIH or "National Institutes of Health")) OR (JLM OR "Jerusalem OSD" OR "Hal Far" OR "Arrow Malta") OR (("adverse event\*" or AER\*) OR bladder\* OR blood\* OR (cancer\* or precancer\* or pre-cancer\*) OR colon\* OR (death\* or dead or fatal) OR esophag\* OR gastro\* OR intestin\* OR (kidn\* or renal\*) OR laten\* OR leukemia\* OR liver\* OR lymphoma\* OR (MedWatch\* or "Safety Information and Adverse Event Reporting") OR muta\* OR myeloma\* OR (NHL or non-hodgkin\*) OR toxicolog\* OR onset\* OR oncolog\* OR ovar\* OR PADER\* OR pancrea\* OR prostate\* OR stomach\*) OR (Agency OR inspect\* OR regulat\*) OR ((backup W/3 data) OR (impurit\* and degradant\*) OR recall\* OR residu\* OR solvent\* OR spike\* OR test\* OR (unknown W/3 peak or unknown W/3 spike or unknown W/3 impurit\* or unknown W/3 contamin\*)))

- This term is returning a significant number of false positives based primarily on "delete," "destroy," and "remove" being used in the context of standard disclaimer language for potentially confidential communications. We believe at least some of this can be alleviated by excluding results which include known disclaimer language.

2. Our document team has identified a number of search strings that require minor modifications from the way in which they appear to be laid out on the protocol in order to run correctly. This largely consists of adding parentheses. We would send a spreadsheet with the precise modifications, none of which are intended to be substantive.

3. Trailing wildcards: two terms – "up\*" (as part of "cover up\*" and its variations) and "var\*" – are creating a significant number of false positives. We have generated a list of hits for these terms and would like to propose amending the search to include whichever variants you feel are appropriate rather than the trailing wildcard.

4. Leading wildcards: These terms are creating a significant number of false positives with respect to the numeric terms (e.g. "\*ANDA#") and "\*azide\*", in particular.

5. We are confirming our list of facility names used internally with the client and will provide that for use as soon as possible.

We understand similar discussions may be taking place with the other Defendants, so please let us know if any of the above issues have been addressed in a way that might expedite our discussions. Please note that we are still working on all of these issues and developing more concrete proposals for how to remedy, but will be prepared to share preliminary search information as part of any discussion.

Best,

**Steven M. Harkins**  
Associate

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